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7 ***Northern Nevada Electrical Workers Health & Welfare Trust Fund, et al.***
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10 UNITED STATES DISTRICT COURT
11 DISTRICT OF NEVADA

12 NORTHERN NEVADA ELECTRICAL
WORKERS HEALTH & WELFARE
13 TRUST FUND; ELECTRICAL WORKERS
DEFINED CONTRIBUTION PENSION
14 PLAN FOR NORTHERN NEVADA;
NORTHERN NEVADA ELECTRICAL
15 JOINT APPRENTICESHIP AND
TRAINING COMMITTEE TRUST FUND;
16 NATIONAL ELECTRICAL INDUSTRY
FUND; LOCAL LABOR-MANAGEMENT
17 COOPERATION FUND; NATIONAL
LABOR-MANAGEMENT
18 COOPERATION FUND,
ADMINISTRATIVE MAINTENANCE
19 FUND; and the NATIONAL ELECTRICAL
BENEFIT FUND,
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21 Plaintiffs,

22 v.

23 EVO ELECTRIC LLC; DAVID
MANSFIELD, RICHARD SAMUEL
24 BACARELLA; JOSEPH KRUSE; PHILLIP
DANIEL PRUZENSKY; OHIO
CASUALTY INSURANCE COMPANY
25 DBA LIBERTY MUTUAL INSURANCE
COMPANY DOES 1-10, inclusive; ROE
26 ENTITIES I-X, inclusive,
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28 Defendants.

CASE NO: 3:24-cv-00125-MMD-CSD

ORDER GRANTING

JOINT STIPULATION FOR
DISMISSAL OF CLAIMS AND
COUNTERCLAIMS BETWEEN
PLAINTIFFS AND DEFENDANTS
BACARELLA AND PRUZENSKY

1 Plaintiffs, NORTHERN NEVADA ELECTRICAL WORKERS HEALTH & WELFARE
2 TRUST FUND; ELECTRICAL WORKERS DEFINED CONTRIBUTION PENSION PLAN FOR
3 NORTHERN NEVADA; NORTHERN NEVADA ELECTRICAL JOINT APPRENTICESHIP
4 AND TRAINING COMMITTEE TRUST FUND; NATIONAL ELECTRICAL INDUSTRY
5 FUND; LOCAL LABOR-MANAGEMENT COOPERATION FUND; NATIONAL LABOR-
6 MANAGEMENT COOPERATION FUND, ADMINISTRATIVE MAINTENANCE FUND; and
7 the NATIONAL ELECTRICAL BENEFIT FUND (“**Plaintiffs**”), and Defendants RICHARD
8 SAMUEL BACARELLA; JOSEPH KRUSE; PHILLIP DANIEL PRUZENSKY (“**Defendants**”
9 and together with Plaintiffs, the “**Parties**”), by and through their undersigned counsel, hereby
10 stipulate to an entry of Dismissal With Prejudice of all of the Plaintiffs causes of action against
11 Defendants Bacarella and Pruzensky and Defendants Bacarella and Pruzensky’s counterclaims
12 against Plaintiffs in this action.

13 Left unaffected by this stipulation are the Plaintiffs’ claims and causes of action remaining
14 against currently defaulted defendants DAVID MANSFIELD and JOSEPH KRUSE and
15 Defendants’ Bacarella and Pruzensky’s crossclaims against EVO ELECTRIC LLC and DAVID
16 MANSFIELD. Those claims remain live in this action.

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1 The Parties further stipulate that they will each bear their respective costs and attorney's
2 fees.

3 IT IS SO STIPULATED.
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5 DATED March 5, 2025

DATED March 5, 2025

6 LAW OFFICE OF HEATHR A. IJAMES

REESE RING VELTO, PLLC

7 /s/ Heather Ijames, Esq.

/s/ Nathan R. Ring, Esq.

8 HEATHER IJAMES

Nathan R. Ring

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Attorneys for Defendants Richard Samuel

Attorney for Plaintiffs

Bacarella and Philip Daniel Pruzensky

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15 IT IS SO ORDERED.

16 DATED this 5th day of March 2025.

17 By: 

18 UNITED STATES DISTRICT JUDGE
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CERTIFICATE OF SERVICE

I hereby certify that on the 5th day of March, 2025, I electronically filed the above and foregoing:

**JOINT STIPULATION FOR DISMISSAL OF CLAIMS AND COUNTERCLAIMS
BETWEEN PLAINTIFFS AND DEFENDANTS BACARELLA AND PRUZENSKY**

with the Clerk of the Court using the CM/ECF e-filing system, which provided notice of filing to all registered participants and parties in this case.

Dated this 5th day of March, 2025

/s/ Michelle Wade
An Employee of Reese Ring Velto, PLLC